

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

OLGA BACHILOVA,
Plaintiff

v.

**PRESERVATION SOCIETY OF
NEWPORT COUNTY,**
Defendant

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C.A. No.: 19-cv-0174-JJM-LDA

STIPULATION

Now come the parties in the above-cited matter and hereby stipulate to the following pretrial deadlines:

- fact discovery to close on March 11, 2020;
- Plaintiff's expert witness disclosures due on or before April 10, 2020;
- Defendant's expert witness disclosures due on or before May 11, 2020;
- expert discovery to close on June 10, 2020; and,
- dispositive motions due to be filed on or before July 10, 2020.

In addition, the parties have conferred and believe that it would be productive to conduct discovery prior to a settlement conference. The parties will contact the Court when they determine a settlement conference will be productive.

Alternatively, the parties request that the Court enter an Order setting all pretrial deadlines as it deems fit and proper.

Plaintiff,
By her attorneys,

Defendant,
By its attorneys,

/s/ V. Edward Formisano
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CERTIFICATION

I hereby certify that the within document has been electronically filed with the Court on this 7th day of June, 2019 and is available for viewing and downloading from the ECF system.

/s/ V. Edward Formisano